Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: *Ex Parte* Submission, *In the Matter of the Year 2000 Biennial Regulatory Review - Amendment of Part 22 of the Commission's Rules to Modify or Eliminate Outdated Rules Affecting Cellular Radio Telephone Service and Other Commercial Mobile Radio Services*
WT Docket No. 01-108

Dear Ms. Dortch:

Audi of America (hereinafter "Audi"), a wholly owned subsidiary of Volkswagen of America, Inc. (hereinafter "VWoA"), submits these comments in the above captioned matter.

Audi Supports Embedded Telematics

As a leading automotive company, Audi has chosen to include embedded telematics services as part of the product offering on its new A4, as well as the A6, A8, and allroad models. Audi has contracted with OnStar Corporation to provide telematics services as "Audi Telematics by OnStar". The Audi service offering includes the full range of embedded telematics services offered by OnStar, including automatic crash/airbag deployment notification and emergency call center service.[1] Audi believes the safety and security features of these services and the hands free, voice activated calling capability offer important new opportunities to improve emergency

[1] See www.onstar.com for a complete listing of services

response, increase personal safety and security, and reduce potential driver distraction when making and receiving cellular calls in a vehicle.

Public Safety and Technology Considerations Support Caution by the Commission

Audi shares the concern expressed by OnStar filings in this matter that it is premature to establish a sunset for the AMPS compatibility standard and the supporting technical standards. The OnStar system incorporated into Audi vehicles is analog based. A solution does not yet exist to reliably and rapidly transmit data and voice on the same digital wireless call as required to support ACN, and other location based emergency services as well as other embedded telematics services that involve the transmission of voice and data on the same call such as remote diagnostics.

Further, as noted by OnStar and other commentators, the AMPS standard is the foundation for the nationwide wireless system that exists today. In its comments, Sprint pointed out that no digital format comes close to approaching the 93% geographic coverage supported by analog.[2] Such coverage is obviously a requirement for any effective telematics system.

In addition, Audi is moving to rapidly develop and phase-in a digital solution but urges the Commission in its deliberations to consider that an installed base of vehicles exists. Audi believes initial and subsequent owners of these vehicles should have a reasonable opportunity to benefit from their investment in the safety and security features of these vehicles before the Commission takes any action that could have the potential effect of stranding their investment. Audi notes that embedded telematics with their combination of GPS and cellular technology

embedded into the vehicle will continue to offer crash and emergency location information regardless of whether a particular PSAP has implemented E911 Phase II technology.

If after taking these and other factors into consideration the Commission still believes it should proceed to establish a sunset or phase out of the AMPS requirement, Audi believes the five-year timeframe suggested by various commentators is too short considering technological uncertainty, lack of nationwide digital coverage, and the ownership cycle and public safety benefits of the installed analog vehicle base. Audi believes the Commission should consider at least a three to five year period beyond the five years suggested by some commentators.

Thank you for considering our comments.

Respectfully submitted,

Filip Brabec

Product Manager

Audi of America

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May 2. 2002

[2] See Sprint Comments filed July 2, 2001 in this proceeding at p. 3